

Polek, Jim

From: TROMBADORE, CLAIRE
Sent: Tuesday, December 30, 2014 8:25 AM
To: Polek, Jim
Cc: Greenberg, Ken
Subject: Re: Santa Clara Waste Water and Anterra

Thank you.

On Dec 22, 2014, at 2:45 PM, Polek, Jim <Polek.Jim@epa.gov> wrote:

Hi Claire and Nancy,

Ken asked me to provide you a summary of what we know regarding stormwater, pretreatment, and underground injection control (UIC) at the Santa Clara Waste Water and Anterra facilities in Ventura County. I have added to Amelia Whitson's summary that she sent to Alexis on December 17th. Ken has a call into the Regional Board to get more specific information regarding any potential stormwater issues at these facilities. I am planning to inspect Santa Clara Waste Water, Anterra, and some surrounding industrial users in early February.

Santa Clara Waste Water

- Permitted under CA's industrial general stormwater permit.
- Locally permitted by the Oxnard wastewater treatment plant as a categorical industrial user under the Centralized Waste Treatment category, subject to the pretreatment standards at 40 CFR 437.47.
- City of Oxnard sent the facility three notices of violations in April, June, and November 2014 for pretreatment violations of the biochemical oxygen demand, hydrogen sulfide, and gross beta radioactivity, respectively. These violations do not have any apparent connection to the recent explosion and fire.
- City of Oxnard issued a Cease and Desist Order (CDO) on October 22, 2014 because the gross beta from the facility caused Oxnard WWTP to exceed its NPDES permit limit for gross beta.
- Oxnard WWTP no longer accepts wastewater from the facility; not sure if that was from the CDO or the November 18, 2014 explosion and fire.
- Not NPDES-permitted for wastewater discharge.
- No UIC permit.

Anterra

- Permitted under CA's industrial general stormwater permit.
- Not listed as an industrial user in Oxnard's most recent pretreatment annual report
- Based on a search of the LA Regional Board's website, they don't appear to be permitted under state waste discharge requirements or an NPDES permit for wastewater discharge.
- Permitted for Class II injection wells, which means they can inject liquids from oil and gas production.

- According to EPA OSC Tom Dunkelman, who was on site at Santa Clara Waste Water after the explosion and fire, wastewater arriving at Santa Clara Waste Water was being redirected to Anterra. Not clear whether this redirected wastewater was only oil and gas production liquid.

Please let me know if you have any questions.

Jim

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